

DOCUMENTS ASSOCIATED
WITH CIVIL CASES PENDING
IN THE
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

FILED IN CLERK'S OFFICE U.S.D.C. - Atlanta
MAY 05 2022
KERIN P. WEIMER, Clerk By: <i>[Signature]</i> Deputy Clerk

I. INITIAL DISCLOSURES

A. Plaintiff's Initial Disclosures.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta DIVISION

Christian Mendez
(Plaintiff)
v.
Emory Healthcare
(Defendant)

Civil Action No. 1:22-CV-01445-MHC-RDC

PLAINTIFF'S INITIAL DISCLOSURES

(1) State precisely the classification of the cause of action being filed, a brief factual outline of the case including plaintiff's contentions as to what defendant did or failed to do, and a succinct statement of the legal issues in the case.

Plaintiff files this action for intentional employment discrimination. Plaintiff incorporates his complaint as it stated for reference.

(2) Describe in detail all statutes, codes, regulations, legal principles, standards and customs or usages, and illustrative case law which plaintiff contends are applicable to this action.

Title VII , City of Atlanta ordinance article ✓,
Constructive termination, Invasion of privacy, public
disclosure, negligent retention, intentional infliction
of emotional distress,

(3) Provide the name and, if known, the address and telephone number of each individual likely to have discoverable information that you may use to support your claims or defenses, unless solely for impeachment, identifying the subjects of the information. (Attach witness list to Initial Disclosures as Attachment A.)

(4) Provide the name of any person who may be used at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. For all experts described in Fed.R.Civ.P. 26(a)(2)(B), provide a separate written report satisfying the provisions of that rule. (Attach expert witness list and written reports to Responses to Initial Disclosures as Attachment B.)

(5) Provide a copy of, or a description by category and location of, all documents, data compilations or other electronically stored information, and tangible things in your possession, custody, or control that you may use to support your claims or defenses unless solely for impeachment, identifying the subjects of the information. (Attach document list and descriptions to Initial Disclosures as Attachment C.)

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying

as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

(7) Attach for inspection and copying as under Fed.R.Civ.P. 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. (Attach copy of insurance agreement to Initial Disclosures as Attachment E.)

(8) Disclose the full name, address, and telephone number of all persons or legal entities who have a subrogation interest in the cause of action set forth in plaintiffs cause of action and state the basis and extent of such interest.

None.

(3) Attachment A
Christian Mendez
150 Hutchinson Street NE
Atlanta, GA 30307
Phone: 4438318301

Agents of Emory Healthcare:

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C/O Emory Healthcare
1365 Clifton Road
Atlanta, GA 30322
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Gregory Sutton
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Renee Doe
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Monique Plummer
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Lorez Stevens
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Demetria Doe
C/O Emory Healthcare
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Atlanta, GA 30322
Phone# 706-627-9679

Jamel Dawson
C/O Christian Mendez
150 Hutchinson Street NE
Unit# 708
Atlanta, GA 30307
Phone# 4438318301

(4) Attachment B

Todd Anton
PACT Atlanta, LLC
465 Wynn Way #221
Decatur, GA 30030
Phone# 404-292-3810

Medical Professionals @ PACT Atlanta, LLC
465 Wynn Way #221
Decatur, GA 30030
Phone# 404-292-3810
-They will testify to my Mental Health.

Peachford Hospital
Various medical Professionals
2151 Peachford Road.
Atlanta, GA 30338

(5). Attachment C

Emails
Medical Records
Recordings
Audio Recordings
Documents
Letters

(6) Attachment D

Pain and suffering greater than a hundred Thousand dollars.
Back wages of Ten thousand dollars.
Front Pay of Five thousand dollars.
Cost of suit Twenty-Five hundred dollars.